

**TELEFAX**

Claims 1 and 8 are independent claims directed respectively at an intelligent network method and an intelligent network. The method and network of the present invention are directed at receiving an origination using a network independent address that is linked to a plurality of network specific addresses, and also including a context for the origination. The received origination triggers a request for translation of the network independent address into one of a plurality of network specific addresses. The translation is based on the specified context of origination. Afterwards, the origination is completed using the translated network specific address.

Tatchell relates to a method and system for performing screening and prioritizing of incoming calls. For doing so, an interface called a Personal Agent is provided. A subscriber of the Personal Agent may integrate his telephone services (call screening, voice mail, special treatment, distinctive ringing,...) in one location. As shown on Figure 1, a subscriber may make use of numerous telephone stations 17a-n, and have access to the Personal Agent from all those telephone stations. "When an incoming call is directed to a directory number that the subscriber has identified for call screening 86, the agent is invoked. Invoking the agent does not necessarily mean that the agent answers the call but simply that verification of the subscriber's call screening and prioritization parameters are verified before further routing the call." (Column 21, lines 21-27)

However, Tatchell does not teach nor describe the use of network independent address, or its *linking to a plurality of network specific addresses*. Quite to the contrary, Tatchell is directed to *one single network*, and therefor is not concerned with the possibility of having a plurality of network specific addresses for a single subscriber. Support for such an interpretation of Tatchell can be found on Figure 1, and related description. Since Tatchell does not relate to the use of a network independent address linked to a plurality of network specific addresses, it cannot possibly teach nor describe the translation of such network independent address into one of the network specific addresses. Tatchell rather describes call treatment for multiple locations of a subscriber in one network, but not translation from a network independent address to a network specific address, based on a context. For all those reasons, Applicant submits that the invention of claims 1 and 8, and their dependent claims, i.e. claims 2-7 and claims 8-19, are not anticipated and are patentable in view of Tatchell.

Claims 20-38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tatchell.

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Claims 20 and 27 are independent claims, and claims 21-26 and 28-38 are depending directly or ultimately from them. Claims 20 and 27 are directed to a system and a switching node. Both the system and switching node support origination of a communication addressed to a second party using a network independent address that is linked to a plurality of network specific addresses. In both the system and the switching node of the present invention, the origination also includes a context. Upon receipt of the origination, the system and switching node translate the network independent address to a selected one of the plurality of network specific addresses, based on the context included in the origination.

As previously discussed, Tatchell does not teach nor describe using a network independent address that is linked to a plurality of network specific addresses. Also, Tatchell does not provide any indication of including a context in the origination. Since Tatchell does not describe nor teach using a network independent address, nor the inclusion of a context in the origination, it is not possible for Tatchell to describe the translation of the network independent address into one of the network specific addresses based on the context. Applicant believes that the Examiner has erred in his understanding of Tatchell: call management should not be confused with translation of network independent address into network specific address, the Personal Agent cannot be interpreted as a network independent address, and finally there is no context provided in Tatchell which is used for performing the translation from the network independent address into network specific address for the subscriber. For all those reasons, Applicant submits that claims 20 and 27 are clearly patentable in view of Tatchell. It is also believed that claims 21-26 and 28-38, which depend directly or ultimately therefrom while adding further limitations thereto, are also patentable in view of Tatchell for the same reasons provided in support of claims 20 and 27.

Claims 1-38 stand rejected under 35 U.S.C. 103 (a) as being unpatentable over Tatchell in view of U.S. Patent No. 6,069,945 (hereinafter called Brown).

Independent claims 1, 8, 15, 20 and 27 have been previously discussed. Tatchell has also been previously discussed, and its differences clearly highlighted.

Brown is directed to appending an area code to dialed/called local numbers so as to obtain a unique global routing number. By this appending technique, it is possible to route calls at an international level, with the corresponding unique global routing number. However, the dialed/called

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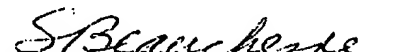
local number is specific to the network in which the called subscriber is located. Therefor, Brown is directed only to network specific addresses, and does not teach nor describe a network independent address. Furthermore, appending an area code and/or country code cannot be considered as a translation between a network independent address into a network specific address, since the dialed/called local number is already a network specific address. Applicant also wish to highlight the fact that the appending of area code described in Brown, is not based on a context provided in an origination.

Neither Tatchell nor Brown teach or describe using a network independent address, nor its translation into a network specific address based on a context received at origination. Therefor, Applicant submits that the presently claimed invention is patentable in view of Tatchell and Brown. Withdrawal of the rejection of claims 1-38 is therefor kindly requested.

#### CONCLUSION

In view of the foregoing, Applicant submits that the present patent application is now in condition for favourable action. Should the Examiner wish to further discuss the present response or patent application, the undersigned can be reached at (514) 345-7891.

Respectfully submitted,

  
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